

**FILED**

**MAR 25 2024**

**CLERK, U.S. DISTRICT COURT  
EASTERN DISTRICT OF TEXAS**

Pritish Vora  
27758 Via Santa Marg. Pkwy, #530  
Mission Viejo, CA 92691  
(949) 292-8359  
Amicus Curiae, Pro Se

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

JOSHUA WILSON, et. al.,  
Plaintiffs,

vs.

LLOYD AUSTIN, III, in his official  
capacity as Secretary of Defense, et. al.,  
Defendants.

Case No.: 4:22-cv-00438-ALM

**MOTION FOR LEAVE TO FILE  
AMICUS CURIAE**

**Hon. Judge Amos L. Mazzant**

COMES NOW, Pritish Vora, Amicus Curiae, by way of Pro Se, files with the Honorable Court his motion for leave to file an informational brief in the above referenced matter in support of the Plaintiffs' pending motion for reconsideration (ECF 61). Amicus intends to provide factual references that warrant judicial notice, to provide facts that may escape the Court's consideration, and to supplement the diligent efforts of counsel. Amicus states as follows:

1. *"The classic role of the amicus curiae is to assist in a case of general*

1 *public interest, supplement the efforts of counsel, and draw the Court's attention to*  
2 *law or facts that may otherwise escape consideration."* See Miller-Wohl Co., Inc.  
3 v. Commissioner of Labor and Indus., 694 F.2d 203, 204 (9<sup>th</sup> Cir. 1982).  
4

5 2. Amicus sought leave and received permission from this Honorable Court  
6 to file as Amicus Curiae in support of the Plaintiffs' motion for a preliminary  
7 injunction, and for leave to file as Amicus Curiae in support of the Plaintiffs' FAC.  
8 (See ECF 25, ORDER granting [18] leave to file Amicus Curiae and ECF 51,  
9 ORDER granting [47] leave to file Amicus Curiae, respectively).  
10  
11

12 3. Amicus intends to save the parties (and the Court) vast judicial resources  
13 by filing a ten-page brief with one exhibit that shall address the following:  
14

- 15 a. The 5<sup>th</sup> Circuit decision in Apter v. FDA.
- 16 b. The 5<sup>th</sup> Circuit case law that supports this Court to retain its  
17 jurisdiction over the unresolved claims.  
18
- 19 c. Defendant HHS updating the website of its subsidiary in  
20 September 2023 showing NO Covid-19 licensed vaccines have  
21 been developed "to date."  
22
- 23 d. A Congressional inquiry into Vaccine Safety Systems airing on  
24 C-SPAN in February 2024 discussing the differences between  
25 the CICP versus the NVICP regarding filed claims.  
26
- 27 e. The importance of having a ruling on the merits of the claim.  
28

WHEREFORE, Amicus respectfully requests that the Court GRANT leave to file the Amicus Curiae brief, attached contemporaneously with this motion for leave.

By: Pratish Vora  
Pratish Vora, Amicus Curiae, Pro Se

**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule CV-7(h), I, Pritish Vora, Amicus Curiae, hereby certify that I sought concurrence with counsel for the respective parties via e-mail prior to filing this motion for leave. I received a response from the parties as follows: Plaintiffs' counsel: unopposed. Defendants' counsel: unopposed.

A proposed ORDER is attached pursuant to CV-7(a).

Respectfully submitted by:




Pritish Vora, Amicus Curiae, Pro Se  
27758 Santa Marg. Pkwy #530  
Mission Viejo, CA 92691  
pvara2112@gmail.com

**CERTIFICATE OF SERVICE**

I, Pritish Vora, Amicus Curiae, hereby certify that I sent the motion for leave to the Clerk of the Court via FedEx on March 22, 2024, and a copy was sent via U.S. first class mail, postage prepaid, to each of the respective parties below.

Respectfully submitted by:



Pritish Vora, Amicus Curiae, Pro Se  
27758 Santa Marg. Pkwy #530  
Mission Viejo, CA 92691  
(949) 292-8359  
pvara2112@gmail.com



1 Attorneys for the Plaintiffs:

2 Brandon Johnson, Esq.

3 DC Bar No. 491370

4 Defending The Republic

5 2911 Turtle Creek Blvd., Suite 300

6 Dallas, TX 75219

7 Tel: (214) 707-1775

8 [bcj@defendingtherepublic.org](mailto:bcj@defendingtherepublic.org)

Dale Saran, Esq.

MA Bar #654781

19744 W 116<sup>th</sup> Terrace

Olathe, KS 66061

Tel: (480) 466-0369

[dalesaran@gmail.com](mailto:dalesaran@gmail.com)

9 Jerri Lynn Ward, Esq.

10 Texas Bar #20844200

11 Garlo Ward, P.C.

12 1017 Rose Circle

13 College Station, Texas 77840

14 Tel: (512) 302-1103 ext. 115

15 [jward@garloward.com](mailto:jward@garloward.com)

16 Attorney for the Defendants:

17 Jody D. Lowenstein

18 Mont. Bar. No. 55816869

19 Trial Attorney

20 United States Dept. of Justice

21 Civil Division, Federal Programs Branch

22 1100 L Street, N.W.

23 Washington, DC 20005

24 Tel: (202) 598-9280

25 [jody.d.lowenstein@usdoj.gov](mailto:jody.d.lowenstein@usdoj.gov)